

LAW OFFICE OF RESHMA KAMATH

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COUNSEL FOR DEFENDANTS

**RUIFENG BIZTECH INC.; GANGYOU WANG;
ALAN LI; AND, RF BIOTECH LLC.**

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

QUINTARA BIOSCIENCES, INC.,
a California corporation,

Plaintiffs,

v.

RUIFENG BIZTECH INC., a
California corporation, GANGYOU
WANG, an individual, ALEX
WONG, an individual, ALAN LI,
an individual, RUI SHAO, an
individual, and RF BIOTECH LLC,
a California limited liability
company,

Defendants.

Case No. 3:20-cv-04808-WHA

*[Assigned to presiding Judge Honorable
William Alsup]*

**ADDENDUM TO JOINT DISCLOSURE
OF TRIAL EXHIBIT LIST PURSUANT
TO FED. R. CIV. P. 26(A)(3)(A)**

**TO THE HONORABLE COURT, ALL PARTIES, AND ATTORNEYS OF
RECORD, HEREIN:**

Pursuant to the Final Pre-trial conference held on June 28, 2023, and Honorable Judge William H. Alsup's direct Orders, the Defendants Ruifeng Biztech Inc., Gangyou Wang, Alan Li, and, RF Biotech LLC ("Defendant") submit the addendum to the joint exhibit list for trial in this matter Disclosure of Trial Exhibits Pursuant to Fed. R. Civ. P. 26(a)(3)(A). The parties reserve the right to amend and/or supplement the below trial exhibit list:

Exh .	Bate-Stamped	Time-Period	Description	Offered By (P/D)	Stip. to Authenticate?	Limitations	Evid. Obj.	Date Marked for ID	Date Admitted
501	Ruifeng 0001-0060 [disc. QB000007-QB08233]	2013-2020	Translated e-mails between Quintara/Ruifeng operating as one entity with English translation	D					
502	Ruifeng 0061-00100 [disc. QB000441-QB00891]	2013-2020	E-mails acknowledging joint venture cooperation partnership agreement	D					
503	Ruifeng 0101-0103	2013	Ruifeng-Quintara Joint Co-cooperation Agreement in Chinese language	D					
504	Ruifeng 0104-0106	2019	Ruifeng-Quintara Joint Co-cooperation Agreement dated 2019 in the Chinese language with translation in English	D					

505	Ruifeng 0107-0200	2013- 2020	Haystack Invoices from 2013-2020	D					
506	Ruifeng 0201-0351 [Disc. RUIFENG 000009352- RUIFENG 000009562]	2013- 2020	Ruifeng Tax Documents W-2 for shared employees, Sue Zhao and Richard Shan	D					
507	Ruifeng 0352-0405 [Disc. QB008095- QB008226]	2013- 2020	Rene Novoa communications from Haystack report dated May 14, supplemental report dated July 07, 2021, and bio	D					
508	Ruifeng 0406-0502 [Disc. Ruifeng 000001- 00000096]	2013- 2020	RF Bio server	D					
509	Ruifeng 0503-0536 [Disc. QB009527- 009557]	2013- 2020	Contact List: Quintara Vendor and Customer List entitled 'profile database'	D					
510	Ruifeng 0537- 0542 [Disc. QB Ex. 8- 12]	2013- 2020	Alex Wong's phone call logs from deposition exhibits	D					
511	Ruifeng 0543- 0566 [Disc. QB Ex. 301-303]	2013- 2020	J. Berryhill report exhibits produced at deposition dated 07/15/2021	D					
512	Ruifeng 0537- 0542	2013- 2020	Investment Blvd., Suite 2. 1-247 pgs	D					

513	Ruifeng 0537-0720 [disc. TK0056-TK0218]	5/7/2019	Tomo Kimura deposition transcript dated 05/07/2019	D					
514	Ruifeng 0721-0916 [disc. Ruifeng 000011022-00011203]	2013-2020	Customer invoices with related communications	D					
515	Ruifeng 0917-0921 [disc. Ruifeng 000011255]	2013-2020	Trial Graphix invoices with excel sheet with information such as the smart devices, computer, computer stations, custodian, custodian e-mails.	D					

516	Ruifeng 0921-0922 [disc. Ruifeng 0009564]		WeChat Messages from phone numbers	D	-				
517	Ruifeng 0923-0950 [Disc. QB 25-32]	TBA	Deposition of Christine Chen	D					
518	Ruifeng 0951-1118 [Disc. HU_00000001 – HU_00000683]	2013-2020	Documents from Deposition of Henry Hu	D					
519	Ruifeng 1119-1150 [Disc. JB00001-JB000029]	2021	Deposition of Jon BerryHill production documents	D					
520	Ruifeng 1151-1231 [disc. QB59-62]	05/13/2021	Deposition of Dehua Zhao documents produced	D					

521	Ruifeng 1232-1334 [disc. QB47-58 T Owens]	2021	Deposition of Tiffany Owens documents	D					
522	NONE	TBA	NONE	D					
523	NONE	TBA	NONE	D					
524	Ruifeng 1335-1400 [disc. 13-20 Qun Shan]	TBA	Deposition of Qun Shan [Richard Shan] agent of QB, documents, e.g., letter re joint cooperation	D					
525	Ruifeng 1401-1472 [disc. QB 43-50]	TBA	Deposition of Hailong Jiao documents	D					
526	Ruifeng 1473-1773 [disc. RUIFENG-ZHI 000019-000073; QB2, 2A, 74-81; AEO Highly confidential material]	2021	Deposition of Charles Zhi, such as e-mails, documents, and miscellaneous	D					
527	Ruifeng 1774-3107	2021	Deposition of Maryellen Sebold - Expert Rebuttal Report dated May 28, 2021 of pgs. 1333.	D					
528	Ruifeng 3108-3308 [QB. Exh. 120-130]	2021	Deposition of Rene Nova documents 10 pgs.	D					

529	Ruifeng 3309-3700 [RUIFENG-HAYSTACK 00006359-06544]	2021	Haystack tracking of documents, computer, office equipment from Maryellen Sebold and Rene Novoa.	D					
530	Ruifeng 3701-3706;	2021	Chain of Custody from Alan Li to Rene Novoa; Sergio Garcia; Nick Passaro.	D					
531	Ruifeng 3707-3712	2021	E-mails of Dorothe Shuche	D					
532	Ruifeng 3712-4200	2013-2020	E-mails acknowledging joint venture cooperation partnership agreement	D					
533	Ruifeng 4201-13300 [Disc. QB00411-009783]	2013-2020	Employee preparation documents	D					
534	Ruifeng 13300-13701 [Disc. QB00441-00872]	2013-2020	Immigration documents	D					
535	Ruifeng 13701-14801 [Disc. QB00373-07583; Ruifeng00010427 - Ruifeng00011021]	2013-2020	Financial documents	D					

536	Ruifeng 14802-14805 [Deposition Xueling Zhao Highly confidential AEO documents]	2021	Deposition of Xuileng Zhao Highly confidential AEO documents; salary records	D					
537	Ruifeng 14806-22000 [Disc. QB001021-9783]	2013-2020	Quintara's stealing of trade secrets from Ruifeng	D					
538	Ruifeng 22000-22001	2013-2014	Ruifeng/Gangyou Wang's payment of \$1Million USD to Quintara/Richard Shan	D					
539	Ruifeng 22002-22249 [BMP 0001-000247]	03/2017	Lease Exhibit Harbor Way, South San Francisco from BlackMountain	D					
540	Ruifeng 22250-22255	2019	Insurance Claim Information	D					
541	NONE	NONE	NONE	D					

542	NONE	NONE	NONE	D					
543	Ruifeng 22250-22295	NONE	Deposition of Stacy Wenbo Xu	D					
544	Ruifeng 22296-22305 [RUIFENG 096-102]	2013-2020	Ray Shao e-mails	D					

545	Ruifeng 22306-22308 [RUIFENG 0000009563- 9564]	2013-2020	Alex Wong Android phone messages 2 pgs.	D					
546	NONE	NONE	NONE	D					
547	NONE	NONE	NONE	D					
548	Ruifeng 22306-22310	2013-2020	Drop-off Site documents 2 pgs.	D					
549	Ruifeng 22310-22600 [QB008028- QB008072]	2013-2020	Quintara balance sheets	D					
550	Ruifeng 22601-22702 [QB008030; 39;44;50;56;62; 69; QB008075]	2013-2020	Quintara Profit & Loss Statements	D					
551	Ruifeng 22703-22709	2013-2020	Ruifeng RSM documents 4 pgs	D					
547	Ruifeng 22710-22900	2013-2020	Ruifeng Financial documents [Bank of America]	D					
548	NONE	2013-2020	NONE	D					
549	Ruifeng 22306-22308	2013-2020	RuiFeng Relativity Export	D					
550	Ruifeng 22900-23000	9/18/2020	BlackHill documents	D					
551	Ruifeng 23001-23805 [disc. QB008271- QB008780]	2013-2021	Ruifeng-Quintara Customer Profile Database 250 pgs	D					

552	Ruifeng 23806-23950 [disc. QB108-113]	2021	Deposition Alan Li documents	D						
553	Ruifeng 23951-25000 [disc. QB18-104]	2021	Deposition of Gangyou Wang documents	D						
554	Ruifeng 25001-25052	2021	Deposition of Stacy Wenbo Xu documents.	D						
555	Ruifeng 25053-25055	2019	Quintara-Ruifeng Signed Agreement	D						
556	Ruifeng 25056-25057 [RUIFENG 0009563-9564]	2013-2020	Mobile Reports for Gangyou Wang, Alan Li excel sheet – instant messages. chats	D						
557	NONE	NONE	NONE	D						
558	NONE	NONE	NONE	D						
559	NONE	NONE	NONE	D						
560	NONE	NONE	NONE	D						
561	NONE	NONE	NONE	D						
562	NONE	NONE	NONE	D						
563	NONE	NONE	NONE	D						
564	Ruifeng 25058-28803 [Ruifeng-RSM-000001-00003704]	2013-2020	Ruifeng RSM documents	D						
565	Ruifeng 28804-30000 QB008231-9804 RUIFENG 00011256-00011817; 00011818-00011948	2013-2020	Ruifeng Financial documents	D						
566		NONE	NONE	D						
567		NONE	NONE	D						
568		NONE	NONE	D						
569		NONE	NONE	D						

570	Ruifeng 30000-30005	03/16/2017	Lease Exhibit Harbor Way, South San Francisco [QB46 T Owens]	D					
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LAW OFFICE OF RESHMA KAMATH

DATED: June 30, 2023

/s/ Reshma Kamath

Reshma Kamath,
Counsel for Defendants RUIFENG BIZTECH
INC.; GANGYOU WANG; ALAN LI; and, RF
BIOTECH LLC

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